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UNITED STATES DISTRICT COURT  
NORTHERN DISTRICT OF CALIFORNIA  
SAN FRANCISCO DIVISION

UNITED STATES OF AMERICA,	)	CASE NO. 20-CR-00249 RS
Plaintiff,	)	
v.	)	<b>DECLARATION OF DAVID WARD IN</b>
	)	<b>SUPPORT OF UNITED STATES'</b>
ROWLAND MARCUS ANDRADE,	)	<b>MEMORANDUM IN SUPPORT OF CIPA</b>
Defendant.	)	<b>SCHEDULING ORDER</b>

I, David Ward, declare and state as follows:

I am an Assistant United States Attorney for the Northern District of California, and I am assigned to the above-captioned case.

1. On July 31, 2024, the government provided to defense counsel Michael Shepard, Kerrie Dent, and Cindy Diamond via email a copy of the government's proposed CIPA Briefing Schedule.

2. On August 9, 2024, government counsel met and conferred with defense counsel Dent and Diamond via videoconference regarding a proposed CIPA briefing schedule in this case.
3. On August 12, 2024, I met and conferred by telephone with defense counsel Dent regarding a proposed briefing schedule in this case.
4. On August 13, 2024, I notified defense counsel by email that the government would agree to move up its initial CIPA Section 4 filing deadline to October 1, 2024, and would also agree to move up subsequent CIPA filing dates accordingly.
5. I spoke by phone with defense counsel Dent on August 27, 2024 regarding a proposed briefing schedule in this case.
6. On August 28, 2024, government counsel received an email from Ms. Dent which stated in relevant part: "*CIPA: we would like to move forward with 4-pagers rather than agree to a schedule.*" The email provided no further explanation or detail.

Executed this 29th day of August, 2024, in San Francisco, California.

/s/ David Ward  
DAVID WARD  
Assistant United States Attorney